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September 6, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Accelerating Wireless/Wireline Broadband Deployment by Removing
Barriers to Infrastructure Investment, WT Docket Nos. 17-79 and 17-84;
Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

On September 4, 2019, Michael Rosenthal and Kasey Chow of Southern Communications Services, Inc. d/b/a Southern Linc, Allen Bell of Georgia Power Company, Coy Trosclair of Southern Company Services, Inc., and J. Wells Ellenberg of Southern Company (collectively, “Southern”), together with the undersigned, met separately with Aaron Goldberger, Legal Advisor to Chairman Ajit Pai, and with William Davenport, Legal Advisor to Commissioner Geoffrey Starks. On September 5, 2019, the Southern representatives, together with the undersigned, met separately with Commissioner Michael O’Rielly and his Legal Advisor, Erin McGrath, with Umair Javed, Legal Advisor to Commissioner Jessica Rosenworcel, and with Will Adams, Legal Advisor to Commissioner Brendan Carr.

The purpose of these meetings was to discuss the Commission’s efforts to promote the deployment of infrastructure for 5G and other wireless services. In particular, Southern described in these meetings how certain electric utilities, such as Southern’s electric utility subsidiaries Georgia Power and Alabama Power, have been voluntarily implementing programs and partnerships to proactively facilitate the colocation of small cells and other wireless communications facilities on utility-owned assets such as streetlights, transmission facilities, and other structures. Southern explained how these programs and partnerships foster innovation and cooperation that result in faster and more efficient deployment of 5G and other wireless infrastructure than could be achieved through regulation.

Southern explained how street lights provide an example of the complex practical and logistical issues that can be most effectively and efficiently addressed through a voluntary,



market-driven, and cooperative approach to wireless colocation. As an initial matter, street lights may be owned by a variety of different entities, and there may often be a patchwork of street light ownership even within a single jurisdiction or area. For example, Georgia Power itself owns almost 1 million street light structures in the State of Georgia and provides power to many thousands of other street lights in Georgia that are owned by other entities, such as municipalities, state highway or other agencies, and other private entities. In addition, the vast majority of street lights in Georgia Power's service territory are not structurally capable of supporting wireless communications facilities, thus requiring the complete replacement of the street light structure in order to accommodate wireless colocation. Moreover, Georgia Power's street lights are further subject to a variety of local requirements regarding lighting performance and characteristics, aesthetics, and other requirements. Through its wireless colocation program, Georgia Power provides wireless communications companies with a way to overcome these complexities and deploy their networks quickly and efficiently.

Other utilities around the country have taken a similarly proactive approach to facilitating the deployment of 5G and other wireless infrastructure, and many more are observing closely as they consider doing likewise based on their own unique local conditions and considerations. Southern urges the Commission to refrain from any regulation that may stifle these efforts and to instead encourage and incentivize voluntary programs and partnerships such as these, which provide the most effective way to accelerate the availability of 5G and other advanced wireless services to the public.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceedings.

Respectfully submitted,

/s/ David D. Rines

David D. Rines

Counsel to Southern Company

cc: Chairman Ajit Pai
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks
Aaron Goldberger
Erin McGrath
Will Adams
Umair Javed
William Davenport